

Rainier Commons LLC

Catch Basin Sampling Source Control Action Report

September 5th, 2014

Michelle Mullin, EPA Project Manager:

Pursuant to Condition 6 of the Work Plan approval for the exterior paint abatement work at Rainier Commons and the corresponding Catch Basin Sampling Plan in the IPWP for the Phase I work, and as requested in your August 13, 2014 email, we commissioned NVL Labs to collect additional samples of sediment and water during blasting operations. The sample results and reports are attached.

The sample results exceed our action trigger for PCBs at 0.1 µg/L for aqueous samples and 1 ppm for sediments.

Upon receipt of the samples, Rainier Commons initiated an immediate review and inspection of the site's containment enclosures. The containment enclosures were found to be sealed in all respects and were performing.

Manometer monitoring, analytical air sampling, particulate monitoring, and daily ongoing oversight inspections all indicate that materials in catch basin samples are not escaped blasting media.

There have been no signs of visible dust emanating from either enclosure, no observed track-outs of any kind, and proper decontamination procedures and facilities are in place and properly used. Notwithstanding the above, and in addition to our regular source control activities, Rainier Commons undertook and is undertaking the following additional steps in response to the sampling results.

Recent actions taken include:

1. Catch Basin 15 and Manhole 8 located in the Courtyard, which flow into Manhole 6 were cleaned on September 4th, 2014 (Exhibit B).
2. Cleaning CB2, CB3 and CB4 from sediments and water is scheduled for Monday, September 8th, 2014. CB2 and CB4 flow into CB3.
3. Replacing all existing filter socks on the west side including the secondary layer is scheduled for next week. The following CB included: CB1, CB2, CB3 and CB4 (on September 4th we replaced secondary layer).
4. Installing new "Catch All" for CB1 and CB2. (Exhibit C)
5. The mislabeling of CB12 on MSI reports was acknowledge by MSI and will be reflect on new reports starting the week of August 18th, 2014. (Exhibit D)
6. Continuing to inspect, maintain, adjusted and/or replace filter socks in each catch basin as well as on roof drains. Done on a weekly basis or/and as needed.
7. Clean up of the premises by visual inspection for debris including detached paint chips via shop vacuum and hand collection. In addition to our weekly power sweep by MSI trucks including the court yard area.
8. Shop vac courtyard/breezeway area with HEPA filter and continue collecting paint chips by hand as well on a weekly basis.

Vered Mizrahi
Rainier Commons LLC

RCLLC 0005115

EXHIBIT B



CB15(SD8) after cleaning 09.04.14



CB15(SD8) after cleaning 09.04.14



MH6(CB16) after cleaning 09.04.14

EXHIBIT C



CB1 new "Catch All" is installed on 8.11.14



CB2 new "Catch All" is installed on 8.11.14

EXHIBIT D



P.O. Box 461 Ravensdale, WA 98051-0461- Phone: (425) 432-1054 – Fax: (425) 432-3155

August 20, 2014

To whom it may concern:

I, Christine McGee, hereby acknowledge that there was a typographical error on the weekly reports, starting with any reports dated June 2, 2014 to August 15, 2014.

In any of the reports that state CB14, it should be CB12.

Sincerely,

A handwritten signature in black ink, appearing to read 'Christine McGee', written over a large, stylized circular flourish.

Christine McGee
Office Manager